

1 J. Andrew Coombs (SBN 123881)
andy@coombspc.com
2 Nicole L. Drey (SBN 250235)
nicole@coombspc.com
3 J. Andrew Coombs, A Prof. Corp.
517 East Wilson Avenue, Suite 202
4 Glendale, California 91206
Telephone: (818) 500-3200
5 Facsimile: (818) 500-3201

6 Attorneys for Plaintiff
Warner Bros. Home Entertainment Inc.

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 Warner Bros. Home Entertainment Inc.,

11 Plaintiff,

12 v.

13 Todd Beckham, an individual and d/b/a as
14 Amazon.com Seller Todd Beckham and
15 Does 1-10, inclusive,

16 Defendants.

CV12 06528 SJO PLA
COMPLAINT FOR COPYRIGHT
INFRINGEMENT

DEMAND FOR A JURY TRIAL

17 Plaintiff Warner Bros. Home Entertainment Inc. ("Warner Bros.") for its
18 Complaint allege as follows:

19 A. Introduction

20 1. Warner Bros. owns exclusive United States distribution rights in various
21 creative works, including, but not limited to, *Hung*, *One Tree Hill*, *Harry Potter and*
22 *the Sorcerer's Stone*, *Harry Potter and the Chamber of Secrets*, *Harry Potter and the*
23 *Prisoner of Azkaban*, *Harry Potter and the Goblet of Fire*, *Harry Potter and the*
24 *Order of the Phoenix*, *Harry Potter and the Half-Blood Prince*, and *Harry Potter and*
25 *the Deathly Hallows Parts I and II* ("the Warner Bros. Works"). The Harry Potter
26 movies were released over a period of ten years and are among the films which
27 secured the highest box office receipts of any films ever released. Each of the Warner
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1 Bros. Works is entitled to copyright protection. Defendants, through the online venue
2 Amazon.com, distribute, promote, offer for sale and sell counterfeit copies of the
3 Warner Bros. Works (the "Counterfeit Product"). Warner Bros. is informed and
4 believes and based thereon alleges that this infringement activity is systematic and
5 willful or done with reckless disregard of Warner Bros.' intellectual property rights.
6 Warner Bros. asks that this Court enjoin that activity and order Defendants to pay
7 damages pursuant to the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.* (the
8 "Copyright Act.").

9 **B. Jurisdiction and Venue**

10 2. Plaintiff brings this action pursuant to 17 U.S.C. §§ 101, *et seq.* The
11 Court has jurisdiction over the subject matter pursuant to 28 U.S.C. § 1331 and §
12 1338(a).

13 3. The events giving rise to the claim alleged herein occurred, among other
14 places, within this judicial district. Venue in the Central District of California is
15 proper pursuant to 28 U.S.C. § 1391(b) and § 1400(a).

16 **C. Warner Bros.**

17 4. Warner Bros. is a corporation duly organized and existing under the
18 laws of the State of Delaware, having its principal place of business in Burbank,
19 California.

20 5. Warner Bros. and certain of its affiliated companies are engaged in a
21 variety of businesses including, without limitation, the production and distribution of
22 motion pictures and television programs.

23 6. Warner Bros. owns exclusive rights under the Copyright Act to the
24 Warner Bros. Works, including the rights to reproduce, distribute or license the
25 reproduction and distribution of the motion pictures in video format in the United
26 States, including, but not limited to, those copyrights that are the subject of the
27 copyright registrations which are listed in Exhibit "A," attached hereto, and
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1 incorporated herein by this reference. Video format includes video cassettes, video
2 laser discs, digital versatile discs ("DVDs"), video compact discs ("VCDs") and Blu-
3 ray discs.

4 7. The expression and other distinctive features of the Warner Bros. Works
5 are wholly original with Warner Bros., its licensors and/or assignors and, as fixed in
6 various tangible media, are copyrightable subject matter under the Copyright Act.

7 8. Warner Bros., its affiliates, licensees and/or assignors, have complied
8 in all respects with the laws governing copyright and has secured the exclusive rights
9 and privileges in and to the Warner Bros. Works, and Warner Bros. holds certificates
10 of registration and owns the exclusive right to reproduce, distribute and license the
11 Warner Bros. Works throughout the United States.

12 9. The Warner Bros. Works have been manufactured, sold and/or
13 otherwise distributed in conformity with the provisions of the copyright laws.
14 Warner Bros., its affiliates, licensees and/or assignors have complied with their
15 obligations under the copyright laws, and Warner Bros., in its own right or as
16 successor-in-interest, has at all times been and still is the sole proprietor or otherwise
17 authorized to enforce all right, title and interest in and to the copyrights or to enforce
18 its exclusive rights for home video distribution in each of the Warner Bros. Works.

19 **D. Defendants**

20 10. Defendant Todd Beckham ("Beckham") is an individual and does
21 business on Amazon.com using the seller identity, "Todd Beckham". Plaintiff is
22 informed and believes that Beckham is a resident of Salisbury, in the State of North
23 Carolina. Plaintiff is informed and believes Beckham transacts business in this
24 judicial district through offers and sales of the Counterfeit Product in this judicial
25 district, among other places.

26 11. Upon information and belief, Does 1 – 10 are either entities or
27 individuals who are residents of or present in this judicial district and are subject to the
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1 jurisdiction of the Court. Upon information and belief, Does 1 – 10 are principals,
2 supervisory employees, or suppliers of Defendant or other entities or individuals who,
3 in this judicial district, are manufacturing, distributing, selling and/or offering for sale
4 merchandise which infringes the Warner Bros. Works. The identities of the various
5 Does are unknown to Warner Bros. at this time. The Complaint will be amended to
6 include the names of such individuals when identified. The Defendant and Does 1 –
7 10 are collectively referred to herein as “Defendants.”

8 **E. Defendants' Infringing Activities**

9 12. Amazon.com, Inc. is a Delaware corporation with its principal place of
10 business in Seattle, Washington. Amazon.com, Inc. operates retail websites which
11 include www.amazon.com, www.amazon.co.uk, www.amazon.de,
12 www.amazon.co.jp, www.amazon.fr, www.amazon.ca, www.amazon.cn,
13 www.amazon.it and www.amazon.es.

14 13. Among other things, through its websites, Amazon.com, Inc. offers e-
15 commerce platforms that enable third parties to sell products on Amazon.com (the
16 “Website”). The Website provides services to third-party sellers, including the
17 Defendants. Such services include, but are not limited to, design of the webpage
18 describing and/or illustrating the product being offered by third-party Amazon.com
19 sellers, access to the Internet community seeking product offered by the third-party
20 sellers and fulfillment services through which Amazon.com sellers can have goods
21 shipped from Amazon.com warehouses using Amazon.com employees to perform
22 packaging and shipping services.

23 14. More than two million Amazon.com users employ the Amazon.com e-
24 commerce platform to offer product or services to Internet users. Smaller sellers
25 participate in Amazon Marketplace where they offer new, used and collectible
26 selections at fixed prices to Amazon customers around the world.

27 15. Among the third-party sellers who employ the Website platform to
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1 market, offer, sell and distribute their merchandise are the Defendants. The
2 Defendants have employed the Website to market, offer, sell and distribute the
3 Counterfeit Product. Warner Bros. is informed and believes and based thereon
4 alleges that the Defendants have distributed, advertised and/or sold and continue to
5 copy, reproduce, distribute, advertise and/or sell unauthorized copies of motion
6 pictures owned by Warner Bros., including, but not necessarily limited to, the
7 Warner Bros. Works identified in paragraph 6, above, and Exhibit "A." Defendants
8 do so using the Website. Defendants have not been authorized by Warner Bros. to
9 reproduce, distribute, sell or offer for sale any of the Warner Bros. Works.

10 16. By engaging in this conduct, Defendants have acted in willful disregard
11 of laws protecting Warner Bros.' copyrights. Warner Bros. has sustained and will
12 continue to sustain substantial damage to the value of its creative works, specifically
13 including the Warner Bros. Works.

14 **F. Warner Bros.'s Damages**

15 17. Warner Bros. is informed and believes, and upon that basis alleges, that
16 the Defendants have each obtained gains, profits and advantages as a result of their
17 infringing activity in amounts within the jurisdiction of the Court.

18 18. Warner Bros. is informed and believes, and upon that basis alleges, that
19 it has suffered and continues to suffer direct and actual damages as a result of
20 Defendants' infringing conduct, in amounts within the jurisdiction of the Court. In
21 order to determine the full extent of such damages, including such profits as may be
22 recoverable under 17 U.S.C. § 504, Warner Bros. will require an accounting from
23 each Defendant of all monies generated from the promotion, display, sale and offer
24 for sale of the Defendants' goods and services using the Warner Bros. Works. In the
25 alternative, Warner Bros. may elect to recover statutory damages pursuant to 17
26 U.S.C. § 504 (c) for each of the Warner Bros. Works infringed.

27 19. Warner Bros. has no other adequate remedy at law and has suffered and
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1 continues to suffer irreparable harm and damage as a result of the above-described
2 acts. Warner Bros. is informed and believes, and upon that basis alleges, that, unless
3 enjoined by the Court, Defendants' infringing activity will continue, with attendant
4 irreparable harm to Warner Bros. Accordingly, Warner Bros. seeks preliminary and
5 permanent injunctive relief pursuant to 17 U.S.C § 502 and seizure of the Counterfeit
6 Product, including the means of production as provided by 17 U.S.C. § 503.

7 20. By reason of the foregoing, Warner Bros. has incurred and will continue
8 to incur attorneys' fees and other costs in connection with the prosecution of its claims,
9 which attorneys' fees and costs Warner Bros. is entitled to recover from the
10 Defendants, and each of them, pursuant to 17 U.S.C. § 505.

11 21. Warner Bros. is without an adequate remedy at law in that damages are
12 difficult to ascertain and, unless the Defendants' acts are enjoined, Warner Bros. will
13 be irreparably harmed by Defendants' deliberate and systematic infringement of its
14 rights.

15 PRAYER FOR RELIEF

16 WHEREFORE, Warner Bros. asks this Court to order that:

17 1. Defendants, their agents, servants, employees, representatives,
18 successor and assigns, and all persons, firms, corporations or other entities in active
19 concert or participation with any of the said Defendants, be immediately and
20 permanently enjoined from directly or indirectly infringing the Warner Bros. Works
21 in any manner, including generally, but not limited to:

- 22 a. Reproducing, distributing, shipping, selling or offering for sale
23 unauthorized copies, in any format, of any of the Warner Bros. Works;
24 b. Aiding or abetting the reproduction, distribution, shipment, sale or offer
25 for sale of any unauthorized copies of any of the Warner Bros. Works;
26 or
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1 c. Marketing, advertising and/or promoting any unauthorized copies of the
2 Warner Bros. Works.

3 2. That Warner Bros. and its designees are authorized to seize the following
4 items which are in Defendants' possession, custody or control:

- 5 a. All Counterfeit Product;
- 6 b. Any other unauthorized product which reproduces, copies,
7 counterfeits, imitates or bear any of the Warner Bros. Works, or any
8 part thereof;
- 9 c. Any molds, screens, patterns, plates, negatives, machinery or
10 equipment, specifically including computers, servers, optical disc
11 burners and other hardware used for making or manufacturing the
12 Counterfeit Product or unauthorized product which reproduces, copies,
13 counterfeits, imitates or bear any of the Warner Bros. Works, or any
14 part thereof.

15 3. Defendants be required to pay actual damages increased to the
16 maximum extent permitted by law and/or statutory damages at Warner Bros.'
17 election;

18 4. Defendants be required to account for and pay over to Warner Bros. all
19 damages sustained by Warner Bros. and profits realized by Defendants by reason of
20 Defendants' unlawful acts herein alleged and that those profits be increased as
21 provided by law;

22 5. Defendants be required to pay Warner Bros. their costs of this action
23 and reasonable attorneys' fees; and

24 ///

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26 ///

1 6. Warner Bros. be granted all other and further relief the Court may deem
2 just and proper under the circumstances.
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4 Dated: July 30, 2012

J. Andrew Coombs, A Professional Corp.

6 By: 

J. Andrew Coombs

Nicole L. Drey

Attorneys for Plaintiff Warner Bros. Home
Entertainment Inc.
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DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff Warner Bros. Home Entertainment Inc. hereby demands a trial by jury of all issues so triable.

Dated: July 30, 2012

J. Andrew Coombs, A Professional Corp.

By: 

J. Andrew Coombs
Nicole L. Drey

Attorneys for Plaintiff Warner Bros. Home
Entertainment Inc.

EXHIBIT "A"**COPYRIGHT REGISTRATIONS**

<u>Copyright Registration Number:</u>	<u>Title of Work:</u>	<u>Author of Work:</u>
	HUNG: Season Two	
PA 1-709-033	HUNG: Just The Tip	Home Box Office, Inc.
PA 1-709-034	HUNG: Tucson Is The Gateway To Dick Or This Is Not Sexy	Home Box Office, Inc.
PA 1-709-030	HUNG: Mind Bullets Or Bang Bang Bang Motherfucker	Home Box Office, Inc.
PA 1-699-183	HUNG: Sing It Again, Ray Or Home Plate	Home Box Office, Inc.
PA 1-699-187	HUNG: A Man, A Plan Or Thank You, Jimmy Carter	Home Box Office, Inc.
PA 1-699-180	HUNG: Beaverland	Home Box Office, Inc.
PA 1-706-298	HUNG: The Middle East Is Complicated	Home Box Office, Inc.
PA 1-706-294	HUNG: Third Base Or That Rash	Home Box Office, Inc.
PA 1-706-293	HUNG: Fat Off My Love Or I'm The Allergen	Home Box Office, Inc.
PA 1-709-045	HUNG: Even Steven Or Luckiest Kid In Detroit	Home Box Office, Inc.
	ONE TREE HILL: Season Nine	
Application Pending	ONE TREE HILL: Know This, We've Noticed	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: In The Room Where You Sleep	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: Love The Way You Lie	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: Don't You Want To Share The Guilt?	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: The Killing Moon	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: Catastrophe And The Cure	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: Last Known Surroundings	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: A Rush Of Blood To The Head	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: Every Breath Is A Bomb	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: Hardcore Will Never Die, But You Will	WB Studios Enterprises Inc.

Application Pending	ONE TREE HILL: Danny Boy	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: Anyone Who Had A Heart	WB Studios Enterprises Inc.
Application Pending	ONE TREE HILL: One Tree Hill	WB Studios Enterprises Inc.
PA 1-063-646	HARRY POTTER AND THE SORCERER'S STONE	Warner Bros. Entertainment Inc.
PA 1-105-748	HARRY POTTER AND THE CHAMBER OF SECRETS	Warner Bros. Entertainment Inc.
PA 1-222-542	HARRY POTTER AND THE PRISONER OF AZKABAN	Warner Bros. Entertainment Inc.
PA 1-279-121	HARRY POTTER AND THE GOBLET OF FIRE	Warner Bros. Entertainment Inc.
PA 1-355-547	HARRY POTTER AND THE ORDER OF THE PHOENIX	Warner Bros. Entertainment Inc.
PA 1-647-906	HARRY POTTER AND THE HALF-BLOOD PRINCE	Warner Bros. Entertainment Inc.
PA 1-721-904	HARRY POTTER AND THE DEATHLY HALLOWS PART 1	Warner Bros. Entertainment Inc.
PA 1-742-099	HARRY POTTER AND THE DEATHLY HALLOWS PART 2	Warner Bros. Entertainment Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge S. James Otero and the assigned discovery Magistrate Judge is Paul Abrams.

The case number on all documents filed with the Court should read as follows:

CV12- 6528 SJO (PLA~~x~~)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

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NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

J. Andrew Coombs (SBN 123881)
Nicole L. Drey (SBN 250235)
J. Andrew Coombs, A P. C.
517 E. Wilson Ave., Suite 202
Glendale, California 91206
Telephone: (818) 500-3200
Facsimile: (818) 500-3201

COPY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Warner Bros. Home Entertainment Inc.,

Plaintiff(s)

v.

Todd Beckham (see attachment),

Defendant(s)

CASENUMBER:

CV12 06528 SJO PLA_x

SUMMONS

TO: THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to file with this court and serve upon plaintiff's attorney
J. Andrew Coombs, whose address is:

J. Andrew Coombs, A P. C.
517 E. Wilson, Suite 202
Glendale, California 91206

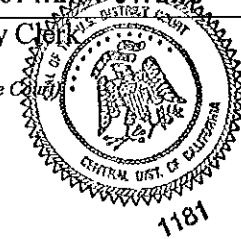
an answer to the ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim
which is herewith served upon you within 21 days after service of this Summons upon you, exclusive
of the day of service. If you fail to do so, judgment by default will be taken against you for the relief
demanded in the complaint.

CLERK, U.S. DISTRICT COURT

Date: JUL 30 2012

By: CHRISTOPHER POWERS
Deputy Clerk

(Seal of the Court)



SUMMONS

SUMMONS ATTACHMENT

Warner Bros. Home Entertainment Inc.,

Plaintiff,

v.

Todd Beckham, an individual and d/b/a as Amazon.com Seller Todd
Beckham and Does 1-10, inclusive,

Defendants.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> Warner Bros. Home Entertainment Inc.	DEFENDANTS Todd Beckham, an individual and d/b/a as Amazon.com Seller Todd Beckham and Does 1-10, inclusive,
(b) County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases): Los Angeles	County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only):
(c) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) J. Andrew Coombs (SBN 123881) J. Andrew Coombs, A Professional Corporation 517 E. Wilson Ave., Suite 202 Glendale, California 91206 / Tel.: (818) 500-3200 Fax. (818) 500-3201	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:33%;">PTF DEF <input type="checkbox"/> 1 <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State PTF DEF <input type="checkbox"/> 4 <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2 <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State <input type="checkbox"/> 5 <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3 <input type="checkbox"/> 3</td> <td>Foreign Nation <input type="checkbox"/> 6 <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF DEF <input type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State PTF DEF <input type="checkbox"/> 4 <input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State <input type="checkbox"/> 5 <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation <input type="checkbox"/> 6 <input type="checkbox"/> 6
Citizen of This State	PTF DEF <input type="checkbox"/> 1 <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State PTF DEF <input type="checkbox"/> 4 <input type="checkbox"/> 4								
Citizen of Another State	<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State <input type="checkbox"/> 5 <input type="checkbox"/> 5								
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation <input type="checkbox"/> 6 <input type="checkbox"/> 6								

IV. ORIGIN (Place an X in one box only.)

☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify): _____
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Copyright Infringement 17 U.S.C. §§ 101 et seq.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): _____

FOR OFFICE USE ONLY: Case Number: _____

CV12 06528

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)

☐ Check here if the U.S. government, its agencies or employees is a named plaintiff.

Los Angeles

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).

☐ Check here if the U.S. government, its agencies or employees is a named defendant.

North Carolina

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)

Note: In land condemnation cases, use the location of the tract of land involved.

Los Angeles

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date

7-30-12

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))